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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL  
CATALDO, JULIAN  
SANTIAGO, and SUSAN LYNN  
HARVEY, individually and on behalf of all  
others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,  
Defendant.

Case No.: 3:20-cv-04688-RS

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED**

The Honorable Richard Seeborg  
Courtroom 3 – 17th Floor  
Date: May 15, 2025  
Time: 1:30 p.m.

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Opposition to Google's Motion to Exclude Plaintiffs' Expert Bruce Schneier (Dkt. 474).

Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Plaintiffs' Opposition to Google's Motion to Exclude Plaintiffs' Expert Bruce Schneier Portions	Google	Refers to Material Designated "Confidential" and "Highly Confidential" by Google pursuant to the Protective Order
GOOG-RDGZ-00168911 Entirety Attached as Exhibit 4 to the Frawley Declaration	Google	Designated "Confidential" by Google pursuant to the Protective Order
GOOG-RDGZ-00015824 Entirety Attached as Exhibit 5 to the Frawley Declaration	Google	Designated "Confidential" by Google pursuant to the Protective Order
GOOG-RDGZ-00017622 Entirety Attached as Exhibit 6 to the Frawley Declaration	Google	Designated "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: April 24, 2025

Respectfully submitted,

By: /s/ Mark Mao

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